

VICKI H. YOUNG  
Law Offices of Vicki H. Young  
706 Cowper Street, Suite 205  
Palo Alto, California 94301

Telephone (415) 421-4347

## Counsel for Salvador Rangel

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF CALIFORNIA**

UNITED STATES OF AMERICA, ) No. CR 08-00775-JF  
Plaintiff, )  
v. ) STIPULATION RE CONTINUANCE  
 ) OF STATUS DATE; {PROPOSED}  
 ) ORDER  
SALVADOR RANGEL, )  
Defendant. )

It is hereby stipulated between the defendant Salvador Rangel, by and through his attorney of record VICKI H. YOUNG, and the government, through Assistant United States Attorney Jeffrey B. Schenk, that the status date of February 4, 2009, at 9:00 a.m. be continued to March 4, 2009, at 9:00 a.m. The reason for this continuance is that the defense counsel needs additional time for to prepare the case and review the discovery. Under Title 18 U.S.C. §3161(h)(8)(B(iv), the continuance is necessary to allow defense counsel the reasonable time necessary for effective preparation of the defense taking into the account the exercise of due diligence.

111

111

**STIPULATION RE CONTINUANCE;  
[PROPOSED] ORDER**

1 It is so stipulated.

2 Dated: January 30, 2009

Respectfully submitted,

4  
5 /s/ Vicki H. Young  
6 VICKI H. YOUNG, ESQ.  
7 Attorney for Salvador Rangel

8 Dated: January 30, 2009

JOSEPH P. RUSSONIELLO  
UNITED STATES ATTORNEY

10 /s/ Jeffrey B. Schenk  
11 JEFFREY B. SCHENK  
12 Assistant United States Attorney

13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26  
STIPULATION RE CONTINUANCE;  
[PROPOSED] ORDER

1  
2  
**PROPOSED ORDER**  
3

4 GOOD CAUSE BEING SHOWN, the status appearance set for February 4, 2009, is continued  
5 to March 4, 2009. This Court finds that the period from February 4, 2009, through and including  
6 March 4, 2009, is excludable time under the Speedy Trial Act, 18 U.S.C. §3161(h). The basis for  
7 such exclusion is the defense counsel needs additional time for investigation and review of  
discovery.

8 Therefore the ends of justice served by such a continuance outweigh the best interest of the  
9 public and the defendants in a Speedy Trial within the meaning of Title 18 U.S.C §3161(h)(8)(A).

10 As required by 18 U.S.C §3161 (h)(8)(B(iv), this Court finds that the reason that the ends of  
11 justice outweigh the best interest of the public and the defendant in a speedy trial are the denial of  
12 the continuance would unreasonably deny the defendant reasonable time necessary for effective  
13 preparation of the pretrial motions and defense, taking into account the exercise of due diligence,  
14 and would deny the defendant continuity of counsel. 18 U.S.C. §3161(h)(8)(B)(iv).

15 DATED: 2/3/09

16   
JEREMY FOGEL  
UNITED STATES DISTRICT JUDGE  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26